



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMH
F. #2014R01413

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 9, 2019

By ECF and By Email

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Re: United States v. Azizjon Rakhmatov and Dilkhayot Kasimov
Criminal Docket No. 15-95 (WFK)

Dear Counsel:

The government writes to provide notice of its intention to call Dr. Lorenzo Vidino as an expert at the upcoming trial of the above-captioned matter. See Fed. R. Crim. P. 16(a)(1)(G). The government renews its request for reciprocal discovery, including any and all expert disclosures.

Dr. Vidino is expected to testify regarding the history, leadership, infrastructure and geographic bases of operation and control of the Islamic State of Iraq and al-Sham ("ISIS") during the relevant time period outlined in the indictment. The government anticipates that Dr. Vidino will also address:

- the process of radicalization;
- the manner and means by which ISIS and its adherents recruited followers and foreign fighters to ISIS, including within the United States;
- the methods by which those followers travelled to ISIS-controlled territory, including but not limited to via Turkey;

- the role of foreign fighters, including those recruited from the United States, within ISIS's overall agenda, including but not limited to its media and public relations strategies; and
- specific acts of terrorism perpetrated by, or claimed by, ISIS.

A recent copy of Dr. Vidino's curriculum vitae is enclosed, marked as 3500-LV-001. We also enclose copies of recent testimony given by Dr. Vidino, marked 3500-LV-002, and a recent report authored by Dr. Vidino, marked as 3500-LV-003. All of the materials produced with this letter are produced subject to the protective orders entered by the Court in this case.¹

The government also anticipates that it will call one or more linguistic experts to testify concerning the accuracy of translations into English from material originally in Uzbek and/or Russian. The government will provide additional information about these witnesses at an appropriate time.

The government reserves the right to call additional expert witnesses and/or substitute expert witnesses. The government will comply with its obligations under Federal Rule of Criminal Procedure 16(a)(1)(G) and Federal Rules of Evidence 702, 703, and 705. The government will notify you in a timely fashion of any additional or substitute experts that the government intends to call at trial and provide you with a summary of the experts' opinions.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ J. Matthew Haggans
J. Matthew Haggans
Assistant U.S. Attorney
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Enclosures (Via Email Only)

Cc: Clerk of Court (WFK) (By ECF) (no enclosures)
Counsel of Record (By ECF)

¹ See Orders dated May 5, 2015 (ECF No. 55-2, as to defendant Kasimov); June 29, 2015 (ECF No. 88, as to defendant Kasimov); June 27, 2016 (ECF No. 154, as to defendant Rakhmatov); and October 3, 2017 (ECF No. 233, as to defendant Rakhmatov).